

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CAROLYN CLARK, *on behalf of herself
and all others similarly situated,*

Plaintiff,

v.

Civil Action No. 3:15-cv-00391 (MHL)

TRANS UNION, LLC,

Defendant.

OLGA ANDERSON, *et. al., on behalf of themselves
and all others similarly situated,*

Plaintiffs,

v.

Civil Action No. 3:16-cv-00558 (MHL)

TRANS UNION, LLC,

Defendant.

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT, CONDITIONALLY CERTIFYING CLASS FOR PURPOSE OF
SETTLEMENT, APPOINTING CLASS COUNSEL, DIRECTING NOTICE TO THE
CLASS, AND SCHEDULING FINAL FAIRNESS HEARING**

Plaintiffs, Olga Anderson, Kim Breeden, Brenda Walker, and Carolyn Clark, with the consent of Defendant, Trans Union, LLC, entered into a Stipulation and Agreement of Settlement (the "Settlement Agreement") attached hereto as Exhibit 1. Pursuant to Fed. R. Civ. P. 23, the Parties hereby file this motion in support of their request for Preliminary Approval of the Class Action Settlement Agreement. For the reasons supplied in the accompanying Memorandum, the Parties respectfully request that the Court enter a Preliminary Approval Order, in the proposed form attached as Exhibit C to the Settlement Agreement:

- (1) Preliminarily approving a proposed class settlement;
- (2) Scheduling a fairness hearing;

- (3) Certifying the settlement class for purposes of the proposed class settlement;
- (4) Appointing class counsel; and
- (5) Approving the form and manner of notice proposed to be sent to all members of the settlement class.

Respectfully Submitted,
PLAINTIFFS,
individually and on behalf of all
others similarly situated

By: /s/
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Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of March 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/

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